

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

|                             |   |                                   |
|-----------------------------|---|-----------------------------------|
| WSOU INVESTMENTS, LLC d/b/a | § |                                   |
| BRAZOS LICENSING AND        | § |                                   |
| DEVELOPMENT                 | § | CIVIL ACTION NO. 6:20-cv-575[ADA] |
| v.                          | § | CIVIL ACTION NO. 6:20-cv-577[ADA] |
|                             | § | CIVIL ACTION NO. 6:20-cv-580[ADA] |
| GOOGLE LLC                  | § | CIVIL ACTION NO. 6:20-cv-585[ADA] |

**OPPOSED MOTION FOR ORAL HEARING ON DEFENDANT GOOGLE LLC'S  
MOTIONS TO DISMISS**

Defendant Google LLC (“Google”), pursuant to Local Rule CV-7(h), respectfully requests a virtual oral hearing on Google’s pending Motions to Dismiss and would show the Court as follows:

1. In civil action numbers 6:20-cv-575 and 6:20-cv-577, Google filed its Motion to Dismiss Under Federal Rule 12(b)(6) For Failure to State a Claim for Relief on September 11, 2020 at Docket No. 16; Plaintiff filed its opposition on September 25, 2021 at Docket No. 19; and Google filed its Reply on October 2, 2020 at Docket No. 21. No Sur-reply was filed, and briefing has thus ended with regard to Google’s Motion to Dismiss in these matters.

2. In civil action numbers 6:20-cv-580 and 6:20-cv-585 Google filed its Motion to Dismiss Under Federal Rule 12(b)(6) For Failure to State a Claim for Relief on September 11, 2020 at Docket No. 18; Plaintiff filed its opposition on September 25, 2021 at Docket No. 21; and Google filed its Reply on October 2, 2020 at Docket No. 23. No Sur-reply was filed, and briefing has thus ended with regard to Google’s Motion to Dismiss in these matters.

3. Google recognizes that the Court has discretion regarding whether to conduct a hearing, and respectfully submits that oral argument will aid the Court in resolving the legal and factual issues implicated by Google’s Motions to Dismiss.

WHEREAS, Google respectfully requests it set a virtual oral hearing on Google's Motions to Dismiss filed in civil action numbers 6:20-cv-575, 6:20-cv-577, 6:20-cv-580 and 6:20-cv-585.

Dated: April 8, 2021

Respectfully submitted by,

/s/ Tharan Gregory Lanier with permission,  
by Michael E. Jones

Tharan Gregory Lanier (pro hac vice)

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**ATTORNEYS FOR DEFENDANT  
GOOGLE LLC**

**CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule CV-7(i), counsel for Defendant, Google LLC, conferred with counsel for Plaintiff, WSOU Investments, LLC d/b/a Brazos Licensing and Development, in a good-faith effort to resolve the matter presented herein and counsel for Plaintiff opposed the motion as drafted.

*/s/ Michael E. Jones* \_\_\_\_\_

**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 8, 2021, I electronically filed this document with the Clerk of Court via the Court's CM/ECF system which will send notification of such filing to all counsel of record, all of whom have consented to electronic service in this action.

*/s/ Michael E. Jones* \_\_\_\_\_